



## South Coast Air Quality Management District

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Planning Department  
10500 Civic Center Drive  
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**Draft Mitigated Negative Declaration for the Proposed Development Review DRC2006-00986 – 81,572 Square Foot Industrial Building on 4.77 acres**

The South Coast Air Quality Management District (SCAQMD) appreciates the opportunity to comment on the above-mentioned document. Based on the SCAQMD staff's review of the proposed project, the analysis should be revised and the document should be recirculated for public review. Should quantification of impacts result in emissions that exceed the SCAQMD's recommended air quality significance thresholds, an environmental impact report is warranted.

The SCAQMD would be happy to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Gordon Mize, Air Quality Specialist – CEQA Section, at (909) 396-3302, if you have any questions regarding these comments.

Sincerely,

Steve Smith, Ph. D.  
Program Supervisor, CEQA Section  
Planning, Rule Development & Area Sources

Attachment

SS:GM

SBC070801-01  
Control Number

### **Lead Agency Does Not Estimate Construction/Operational Emissions**

1. The SCAQMD has repeatedly advised the lead agency that the general plan analysis using URBEMIS7G is woefully out of date because the model relies on EMFAC7G on-road mobile source emission factors, which have since been updated several times. Relying on a model using EMFAC7G emission factors substantially underestimates mobile source emissions. Further, URBEMIS7G relies on trip generation rates from a version of the ITE Trip Generation Manual that has been obsolete for a number of years. The URBEMIS model continues to be updated to reflect the most current on- and off-road emission factors, trip generation rates, and methodologies available. The most current version of the model, URBEMIS2007 version 9.2, was released in early June 2007 and is available to lead agencies to assist them with calculating project-specific impacts for projects in their jurisdiction. Alternatively, the lead agency can calculate air quality impacts using the SCAQMD's CEQA Air Quality Handbook, as long as the most current emission factors are used.

Some of the advantages of using the URBEMIS2007 model, in addition to the fact that it relies on the most current on- and off-road emission factors, are that it also calculates PM<sub>2.5</sub> emissions (see comment #2) and CO<sub>2</sub> emissions. CO<sub>2</sub> is a greenhouse gas. The lead agency should be aware that the Attorney General has indicated that an EIR or MND must analyze greenhouse gas emissions. For this reason and based on the passage of AB32 and recent litigation over CEQA documents, the SCAQMD is advising lead agencies to quantify greenhouse gas emissions.

Because the lead agency has not quantified project-specific air quality impacts from the proposed project, it has not demonstrated that the proposed project will not generate significant adverse construction or operational air quality impacts that may trigger further analysis pursuant to the California Environmental Quality Act.

The lead agency can download the current URBEMIS 2007 land use emissions model at <http://www.urbemis.com> or, as previously mentioned, follow the calculation methodologies in Chapter 9 and the Appendix to Chapter 9 in the South Coast AQMD's CEQA Air Quality Handbook, as long as the most current emission factors are used.

### **PM<sub>2.5</sub> Significance Thresholds**

2. In response to adoption of PM<sub>2.5</sub> ambient air quality standards by U.S. EPA and CARB, SCAQMD staff has developed a methodology for calculating PM<sub>2.5</sub> emissions when preparing air quality analyses for California Environmental Quality Act (CEQA) and National Environmental Policy Act (NEPA) documents. To determine if PM<sub>2.5</sub> air quality impacts are significant, SCAQMD staff has also developed recommended regional and localized significance thresholds. When preparing the air quality analysis for the proposed project, it is recommended that the lead agency perform a PM<sub>2.5</sub> significance analysis by following the guidance found at [http://www.aqmd.gov/ceqa/handbook/PM2\\_5/PM2\\_5.html](http://www.aqmd.gov/ceqa/handbook/PM2_5/PM2_5.html). Further, SCAQMD staff has compiled mitigation measures to be implemented if the PM<sub>2.5</sub> impacts or other pollutant air quality impacts are determined to be significant. Mitigation

measure suggestions can be found at

[http://www.aqmd.gov/ceqa/handbook/mitigation/MM\\_intro.html](http://www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html)

### **Localized Significance Thresholds**

3. As noted on page 7 of the Draft MND, the proposed project is located within one-quarter mile of sensitive receptors. Therefore, the SCAQMD requests that the lead agency evaluate localized air quality impacts to ensure that any nearby sensitive receptors are not adversely affected by the construction activities that are occurring in close proximity. SCAQMD guidance for performing a localized air quality analysis can be found at the following web address: <http://www.aqmd.gov/ceqa/handbook/LST/LST.html>.

### **CO Hotspots Analysis**

4. In the Transportation/Traffic Section 15.a. through 15.g, the lead agency discusses transportation impacts but does not disclose potential project traffic impacts for intersections potentially affected by the proposed project. The lead agency concludes, "The proposed project is consistent with the General Plan for which the FEIR was prepared and impacts evaluated" and that the proposed project "will not create a substantial increase in the number of vehicle trips, traffic volume, or congestion in nearby intersections" but does not provide even a summary of a current traffic study to support that finding. For the purposes of evaluating the proposed project's traffic impacts for CO hotspots analysis, the lead agency should at minimum include the following in the final CEQA document to demonstrate that the potential for CO hotspots is less than significant. The lead agency should identify the intersection(s) that would be affected by the proposed project; quantify the level of service and volume to capacity effects of the proposed project. Quantifying existing traffic volumes, the proposed traffic impacts and the impacts from any proposed mitigation measures are important because the results may warrant performing a CO hotspots analysis. The SCAQMD recommends that a CO hotspots analysis should be performed for any intersection where the LOS declines from C to D or for any intersection rated D or worse where the project increases the volume to capacity ratio by two percent or more.

Should the lead agency, after estimating the proposed project's traffic impacts, believe that a CO hotspots analysis is warranted, please refer to the most current Cal Trans guidance regarding performing a CO hotspots analysis. This information can be obtained at the following internet address: <http://www.dot.ca.gov/hq/env/air/coprot/htm>.

### **Health Risk Assessment**

5. On page 6 in Part I of the Initial Study, the lead agency states that the project will consist of 70,818 square feet of warehouse usage. Depending on the number of truck trips to and from the warehouse, a mobile source health risk assessment may be warranted. The SCAQMD has developed a methodology for estimating cancer risks from mobile sources in a document entitled Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Emissions. This document can be downloaded from the AQMD's CEQA web pages

at the following URL:

[http://www.aqmd.gov/ceqa/handbook/mobile\\_toxic/diesel\\_analysis.doc](http://www.aqmd.gov/ceqa/handbook/mobile_toxic/diesel_analysis.doc)

**Operational Mitigation Measures**

6. The SCAQMD recommends that the lead agency modify mitigation measure #10 on page 6 in Part II of the Initial Study in order to comply with state law.
  - All industrial and commercial facilities shall post signs requiring that trucks shall not be idling for prolonged periods (i.e., in excess of ~~10~~5 minutes).